

Motion of Summary Judgment Support Document

Willie Lee HavMmeri,
Plaintiff

vs.

Methodist Health Systems,
Defendant

Case No. 3:22-cv-00594-E-BT

The Motion for Summary Judgement is FAIR, LEGALLY SOUND & JUST. (Document 35)

Statement 1:

I maintain that my employment was terminated using false claims of time theft.

(I have provided the evidence that the claims of time theft were worth further investigating, at the minimum.)

Statement 2:

I maintain, and will prepare to prove in a court of law, that this termination of employment using false claims occurred to cover up a Formal Complaint made by myself as the Plaintiff, the terminated employee.

This statement is the Summary of my Amended Complaint (Doc. 24).

Summary Judgment establishes a foundational level of Fact for this case.

Statement 1 is the subject of the Motion for Summary Judgement **and must be refuted by MHS** in order for this Order to be DENIED.

Statement 2 is what we are set to argue in court under the Amended Complaint charging MHS with Wrongful Termination, due to Discrimination & Retaliation.

Rule 56. Motion for Summary Judgement or Partial Summary Judgement

- Rule 56(b) – **Time to File a Motion.** Unless a different time is set by local rule or the court orders otherwise, a party may file a motion for summary judgement **at any time** until 30 days after the close of all discovery.
- Rule 56(e) – **Failing to Properly Support or Address a Fact.** If a party fails to properly support an assertion of fact as required by Rule 56(c), the court may:
(3) grant summary judgment **if the motion and supporting materials – including the facts considered undisputed – show that the movant is entitled to it;**

Conclusion

According to Rule 56 of the Federal Rules of Civil Procedure, I am well within my rights to request an Order of Summary Judgment ***at any time*** until 30 days after discovery. This Rule also states that

failure to address a Fact can lead to the granting of summary judgement. MHS has yet to provide any position on whether they refute the evidence I have provided in The Motion For Summary Judgment (Doc. 35, Exhibit 1).

If the MHS position regarding my proposed orders is "We haven't reached Discovery yet!", then I would like to state that I welcome the beginning of Discovery. MHS can feel free to provide a position on anything that I have stated so far during this case for Discrimination & Retaliation.

By this Rule 56 of the Federal Rules of Civil Procedure, regardless of the timing that MHS prefers to give a position, if they can not refute the Facts that this Motion asserts then a Summary Judgment should be GRANTED.

5 Proposed Orders should be considered and granted in damages sought.

I thank the Courts for their consideration on these matters and I'm looking forward to Justice being administered.

Respectfully submitted, November 22th 2022

By: /s/ Willie HavMmeri

Willie Lee HavMmeri, self-represented "Pro se"
godcolored@gmail.com
(214) 600-6207